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ILLINOIS COMMERCE COMMISSION

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Illinois Commerce Commission  
On Its Own Motion

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CHIEF CLERK'S OFFICE

Docket 02-0093

Investigation into the Requirement for a  
Single Overlay for the 312 and 773 NPAs

**VERIFIED COMMENTS OF THE CITY OF CHICAGO**

The City of Chicago, by its attorney, Mara S. Georges, Corporation Counsel, pursuant to the direction of the Administrative Law Judge, hereby files its verified comments in this proceeding.

The City of Chicago agrees that this docket should be closed at this time, without modification to the current number relief plan and without prejudice to the parties' positions regarding the ultimate appropriate numbering resource relief plan for the 312 and 773 NPAs. The City of Chicago contends that due to industry consolidation, the expansion of number portability to wireless carriers, the increase in numbering resources and the increasing substitutability of landline and wireless technology, alternative relief plans may exist that are superior to the one adopted by the Commission several years ago in Docket 98-0847.<sup>1</sup> We assert that, at a minimum, with incumbent competitors controlling app. 20% of all access lines in the 773 and 312 NPAs, the proffered rationale for the imposition of mandatory 10 digit dialing with the implementation of an overlay relief plan is quickly dissipating. In any event, however, the

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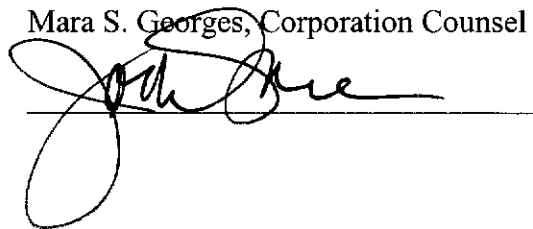
<sup>1</sup> Recently, the availability of numbering resources have caused exhaust dates in some areas of the country to be extended to a point where the relief plan was officially withdrawn in its entirety.

facts developed in the series of workshops held in this docket indicate that it would be premature to evaluate any relief plan alternatives at the present time. As succinctly stated by Staff, "Since initiation of this investigation, the projected exhaust dates for the 312 and 773 NPAs have been extended by more than 4 years." Staff Comments at p. 5. Moreover, it is Staff's opinion that NANPA's current projected exhaust date of 3Q2006 for both the 312 and 773 NPAs is conservative and is likely to be much later. Staff Comments at p. 4. Based on this undisputed scenario, any findings and conclusions made by the Commission in this docket would likely require further review and reevaluation near the time the 312 and 773 NPAs would actually exhaust. Indeed, the prospect of further developments in the telecommunications industry, in the communications marketplace as a whole and in the proliferation of internet technology applications specifically, should certainly give one pause in any prediction of an appropriate number relief plan that would take effect three or more years from now. The City of Chicago intends to monitor these developments and, if appropriate, propose on a timely basis an alternative relief plan that is mutually beneficial for consumers and the industry and in the public interest.

Respectfully submitted,

CITY OF CHICAGO

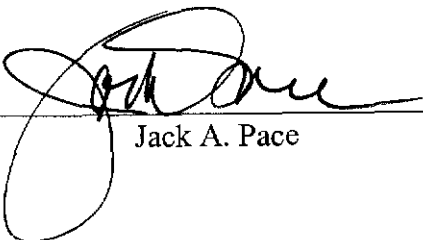
Mara S. Georges, Corporation Counsel

A handwritten signature in black ink, appearing to read "Jack A. Pace", is written over a horizontal line.

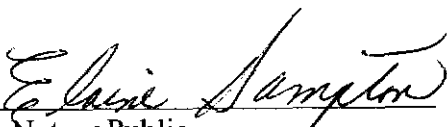
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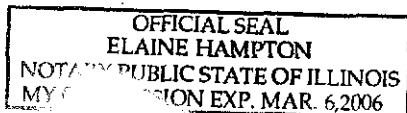
## VERIFICATION

I, Jack A. Pace, being first duly sworn on oath, depose and state that I have read the foregoing comments of the City of Chicago, that I know the contents thereof, and that I know the same to be true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Jack A. Pace

Subscribed and sworn to before me  
this 4th day of November, 2003.

  
\_\_\_\_\_  
Notary Public



**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

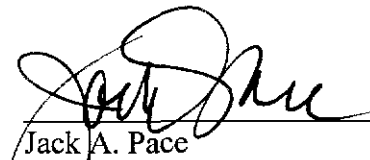
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Investigation into the Requirement for	:	
a Single Overlay for the 312 and 773 NPAs	:	

**NOTICE OF FILING**

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE THAT ON THIS DATE I caused to be mailed to Elizabeth Rolando, Chief Clerk, Illinois Commerce Commission, 527 East Capitol Avenue, P.O. Box 19280, Springfield, Illinois 62794-9280, by first class mail, postage prepaid, the original and three (3) copies of the VERIFIED COMMENTS OF THE CITY OF CHICAGO in the above-captioned docket.

DATED: November 5, 2003

  
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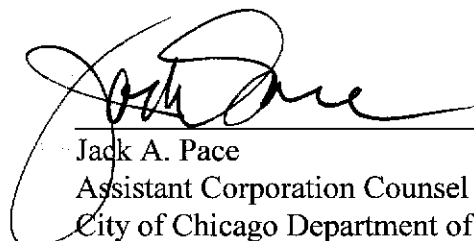
**STATE OF ILLINOIS  
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**CERTIFICATE OF SERVICE**

I, Jack A. Pace, an attorney, hereby certifies that a copy of the foregoing VERIFIED COMMENTS OF THE CITY OF CHICAGO was served upon the party or parties listed below, by first class mail, postage prepaid, or by hand delivery from Suite 900, 30 North LaSalle Street, Chicago, Illinois 60602, in accordance with the Rules of Practice of the Illinois Commerce Commission.

DATED: November 5, 2003

  
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